

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
TEXARKANA DIVISION**

**PANTECH CORPORATION and PANTECH
WIRELESS, LLC,**

Plaintiffs,

v.

**LG ELECTRONICS INC., and LG
ELECTRONICS U.S.A., INC.,**

Defendants.

Case No. 5:22-cv-00113-RWS-JBB

JURY TRIAL DEMANDED

JOINT MOTION TO DISMISS

Pursuant to Rule 41(a) of the Federal Rules of Civil Procedure, Plaintiffs Pantech Corporation and Pantech Wireless, LLC (together, “Pantech”) and Defendants LG Electronics Inc. and LG Electronics U.S.A., Inc. (together, “LGE”) jointly move for dismissal with prejudice of all claims by Pantech against LGE, subject to the term of the parties’ settlement agreement. The parties further move this Court to order that all costs and expenses relating to this litigation up to the time of dismissal shall be borne by the party incurring same. A proposed order accompanies this motion pursuant to the Local Rules.

Respectfully submitted,

/s/ Geoffrey Culbertson

Geoffrey Culbertson
Kelly Tidwell
PATTON TIDWELL & CULBERTSON, LLP
2800 Texas Blvd. (75503)
Post Office Box 5398
Texarkana, TX 75505-5398
(P) (903) 792-7080
(F) (903) 792-8233
gpc@texarkanalaw.com
kbt@texarkanalaw.com

James A. Fussell, III
Jamie B. Beaber
Saqib J. Siddiqui
Tiffany A. Miller
Baldine Paul*
Clark S. Bakewell
Seth W. Bruneel*
MAYER BROWN LLP
1999 K Street, N.W.
Washington D.C. 20006
(202) 263-3000
jbeaber@mayerbrown.com
jfussell@mayerbrown.com
ssiddiqui@mayerbrown.com
tmiller@mayerbrown.com
bpaul@mayerbrown.com
cbakewell@mayerbrown.com
sbruneel@mayerbrown.com

Graham M. Buccigross
MAYER BROWN LLP
Two Palo Alto Square, Suite 300
3000 El Camino Real
Palo Alto, CA 94306
(650) 331-2000
gbuccigross@mayerbrown.com
Gregory J. Apgar
MAYER BROWN LLP
1221 Avenue of the Americas
New York, NY 10020
(212) 506-2500
gapgar@mayerbrown.com

/s/ Jennifer Doan

Jennifer H. Doan
Texas Bar No. 08809050
Mariah L. Hornok
Texas Bar No. 24113074
HALTOM & DOAN
6500 Summerhill Road, Suite 100
Texarkana, TX 75503
Telephone: (903) 255-1000
Facsimile: (903) 255-0800
Email: jdoan@haltomdoan.com
Email: mhornok@haltomdoan.com

James R. Batchelder
(CA Bar No. 136347)
(Eastern District of Texas Member)
James L. Davis, Jr.
(CA Bar No. 304830)
(Eastern District of Texas Member)
David S. Chun
(CA Bar No. 315958)
(Eastern District of Texas Member)
Daniel W. Richards
(CA Bar No. 280595)
(Eastern District of Texas Member)
ROPES & GRAY LLP
1900 University Avenue 6th Floor
East Palo Alto, CA 94303
Telephone: (650) 617-4000
Facsimile: (650) 617-4090
Email: James.Batchelder@ropesgray.com
Email: James.L.Davis@ropesgray.com
Email: David.Chun@ropesgray.com
Email: Daniel.Richards@ropesgray.com

Luiz Miranda
MAYER BROWN LLP
71 S. Wacker Drive
Chicago, IL 60606
(312) 782-0600
lmiranda@mayerbrown.com
(* pro hac vice application to be filed)

**COUNSEL FOR PLAINTIFFS
PANTECH CORPORATION AND
PANTECH WIRELESS, LLC**

Matthew R. Shapiro
(NY Bar No. 5102017)
(Eastern District of Texas Member)
ROPES & GRAY LLP
1211 Avenue of the Americas
New York, NY 10036
Telephone: (212) 596-9000
Facsimile: (212) 596-9090
Email: Matthew.Shapiro@ropesgray.com

**ATTORNEYS FOR DEFENDANTS
DEFENDANTS LG ELECTRONICS INC.
AND LG ELECTRONICS U.S.A., INC.**

CERTIFICATE OF SERVICE

The undersigned certifies that, on this 13th day of August, 2024, all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3).

/s/ Geoffrey Culbertson
Geoffrey Culbertson

CERTIFICATE OF CONFERENCE

The undersigned certifies that pursuant to Local Rule CV-7(h), counsel for Pantech conferred with counsel for LGE on August 13, 2024. All parties agree to the filing of this joint motion.

/s/ James A. Fussell, III
James A. Fussell, III